

Before the Federal Communications Commission
Washington, D.C. 20554

In the Matter of Facilitating the)
Provision of Spectrum-Based Services to Rural) WT Docket
No. 02-381
Areas and Promoting Opportunities for Rural)
Telephone Companies to Provide Spectrum)
Based Services

Comments Submitted by Representative Bart Stupak (D-MI)

This submission is made on behalf of the constituents of Michigan's 1st Congressional District with regards to the current request for comment by the Federal Communications Commission (FCC) on ways to facilitate the delivery of wireless service to rural America.

My district, the First Congressional District of Northern Michigan, is exactly the type of rural area that is the subject of the FCC's inquiry. This district is comprised of 31 counties, with none of the towns in the district exceeding a population of 20,000. The First Congressional District is the largest geographic Congressional district of those states with more than one member of Congress.

I have experienced first-hand the disparate coverage in wireless communications in northern Michigan. After September 11, all members of the U.S. House of Representatives were issued Blackberries, as these were the only communication devices that did not fail on September 11 and were seen as reliable in the event of an emergency. However, in my district my Blackberry does not function.

In addition, I frequently drive long distances throughout the district to attend local meetings and events. There are many areas in which I cannot receive any cellular signal. These are just a few personal examples of the gaps in the deployment of wireless services that exist in my district. I am sure that many residents of northern Michigan could offer factual situations and their personal frustrations on the lack of coverage and service of wireless communications.

These gaps prevent effective wireless voice and data communications.

In addition, with the difficulty in obtaining DSL or cable modem service, wireless offers an innovative alternative for the provision of broadband services. It is clear that wireless services are critical to advancing the connectivity, communications, and information needs of rural areas.

A major obstacle to the widespread provision of wireless services in rural areas is the cost of building the infrastructure and obtaining the spectrum for such service. Rural providers are generally smaller businesses, with less funds, manpower and resources to devote to wireless deployment. As an added burden, the cost of providing wireless service in rural areas is also higher, due to the

geographic challenges of wide areas to cover, with fewer customers.

Because of these challenges, those companies that do attempt to serve the needs of rural areas should be commended, and I am pleased that northern Michigan has several providers that make great efforts to serve their customers. I believe that we must do everything possible to assist these businesses in their efforts to serve rural markets.

A significant step to assist these providers was taken last year in the passage of the Farm Bill, which included major elements of my legislation to provide low interest loans and loan guarantees to help bring high speed digital technology access to rural areas. Eligible entities, including state and local governments and public or private companies, can obtain funding to extend broadband to rural communities. The funding is available on a technology neutral basis. Thus, wireless providers can take advantage of this program to assist them with their funding needs.

There are also several ways available to the FCC to promote the deployment of wireless services in rural areas. First, the FCC can assist by aiding with the economic challenges of serving rural areas. Rural providers are clearly at a disadvantage if they are forced to compete with larger providers who serve profitable urban markets. Any modifications that can be made to the existing spectrum auction rules to diminish the economic difficulties faced by rural providers should be strongly considered.

Furthermore, rural areas have many topographic challenges, including dense woods, iron ore and rock formations that create unique hurdles in deploying wireless services. As a result, the specific geographic characteristics of rural areas should be taken into account in developing power limitations and spectrum allocations for these areas.

I am committed to improving the wireless communications services in rural areas, and look forward to ways in which Congress can work with the FCC to best facilitate this goal. I would like to thank the Commission for initiating this inquiry. I would be interested in providing testimony should the Commission decide to hold hearings on this issue, and would recommend northern Michigan as a venue for a field hearing.

Thank you.